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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

This Document Relates To:

ALL ACTIONS

MDL No. 3047

Case No.: 4:22-md-03047-YGR

**OMNIBUS STIPULATION REGARDING
SEALING JOINT LETTER BRIEF
REGARDING WHETHER CERTAIN
META DOCUMENTS ARE PROTECTED
BY ATTORNEY-CLIENT PRIVILEGE**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

Pursuant to Civil Local Rules 7-11 and 79-5 and this Court's Order Setting Sealing Procedures (Dkt. 341), Plaintiffs and the Meta Defendants submit this Omnibus Stipulation to Seal in connection with the Parties' Joint Letter Brief Regarding Whether Certain Meta Documents are Protected by Attorney-Client Privilege (Dkt. 2474) and Meta's administrative motion to file under seal (Dkt. 2475).

At this time, Plaintiffs do not oppose Meta's request to seal employee names in the filings below and reserve all rights to challenge designations and sealing in the future. The Parties agree that the filings otherwise need not be maintained under seal. Accordingly, the Parties stipulate to the following chart:

Filing	Portion to be Sealed	Basis for Sealing
Joint Letter Brief Regarding Whether Certain Meta Documents Are Protected by Attorney-Client Privilege (ECF No. 2475-1)	Employee Name	There is good cause to seal employee names and personal identifying information to protect their privacy interests at this time. <i>See, e.g., Murphy v. Kavo Am. Corp.</i> , 2012 WL 1497489, at *1 (N.D. Cal. Apr. 27, 2012) (Gonzalez Rogers, J.) (granting motion to seal "employee-identifying information" because "[e]mployees and former employees who are not parties to this litigation have privacy interests in their personnel information, and in other sensitive identifying information"); <i>see also, e.g., Am. Auto. Ass'n of N. California, Nevada & Utah v. Gen. Motors LLC</i> , 2019 WL 1206748, at *2 (N.D. Cal. Mar. 14, 2019); <i>Opperman v. Path, Inc.</i> , 2017 WL 1036652, at *4 (N.D. Cal. Mar. 17, 2017); <i>Hunt v. Cont'l Cas. Co.</i> , 2015 WL 5355398, at *2 (N.D. Cal. Sept. 14, 2015). Sealing is also consistent with the approach the Court took in sealing names of Meta employees in the Personal Injury Plaintiffs' Master Complaint and the multistate Attorney General Complaint. <i>See</i> Dkt. 189; Case No. 4:23-cv-05448-YGR, Dkt. 77. Sealing this name is further warranted to protect the employee's safety, as explained in the April 8, 2025 Declaration of Andre Suite (ECF 1850-1). <i>Cf. Campbell v. Grounds</i> 2022 WL 14151744, at *1 (N.D. Cal. Oct. 24, 2022) (sealing witness name and finding standard met when disclosure "could put at risk the safety of one or more individuals if made public").
Exhibit A, a document produced in this litigation by the Meta Defendants beginning with the Bates number META3047MDL-034-00504889 (ECF No. 2475-2)	Employee Name and Identifying Information	See stated basis above.

Exhibit B, Transcript of February 6, 2025 Deposition of Meta witness (ECF No. 2475-3)	Employee Name	See stated basis above.
Exhibit G, Plaintiffs' Motion to Compel Production of Unredacted Documents, filed in <i>Social Media Cases</i> , No. JCCP 5255 (Cal. Super. Ct.) (ECF No. 2475-8)	Employee Name	See stated basis above.
Exhibit H, a document produced in this litigation by the Meta Defendants beginning with the Bates number META3047MDL-004-00015029 (ECF No. 2475-9)	Employee Name and Identifying Information	See stated basis above.
Exhibit I, Transcript of November 19, 2025 Deposition of Meta witness (ECF No. 2475-11)	Employee Name	See stated basis above.
Exhibit J, a document produced in this litigation by the Meta Defendants beginning with the Bates number META3047MDL-031-00242456 (ECF No. 2475-13)	Employee Name and Identifying Information	See stated basis above.

Documents without privilege redactions were never filed on the docket (and instead were lodged with the Court for *in camera* review). As a result, unsealing the excerpts redacted for privilege is not at issue currently. If the Court determines that any portion of the privilege redactions should be removed,

Meta respectfully requests the opportunity to file a separate motion or stipulation, as appropriate, addressing whether sealing those excerpts is warranted. Meta respectfully requests 14 days to make that determination, or until January 9, 2026 (one full week into 2026), whichever is later, to account for the intervening holidays.

Pursuant to this case's sealing procedures, a Proposed Order implementing this stipulation and a copy of the exhibits with only the redactions listed above are attached.

IT IS SO STIPULATED AND AGREED.

DATED: December 4, 2025

Respectfully submitted,

By: /s/ Ashley M. Simonsen

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ATTESTATION

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: December 4, 2025

By: /s/ Ashley M. Simonsen

Ashley M. Simonsen